

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK-----X
LIANG WANG,

Plaintiff,

vs.

THE PHILHARMONIC-SYMPHONY SOCIETY
OF NEW YORK, INC. AND ASSOCIATED
MUSICIANS OF GREATER NEW YORK, LOCAL
802, AMERICAN FEDERATION OF MUSICIANS,Defendants.
-----X:
:
: Case No.
: 1:24-cv-03356 (AS)
:
: [rel. 1:24-cv-03348 (AS)]
:
:**PLAINTIFF'S CHART IDENTIFYING THE PARAGRAPHS OF THE AMENDED
COMPLAINT IN WHICH THE ELEMENTS OF HIS CLAIMS AGAINST THE UNION
ARE PLAUSIBLY ALLEGED**

This chart identifies the paragraphs of the Amended Complaint in which Plaintiff plausibly alleges the elements of his claims against the Union that it alleges to have not been plausibly pled.

See Ex. Exhibit I to the Declaration of Susan Davis (ECF# 111-9).

COUNT (CLAIM)	ELEMENTS PLAUSIBLY ALLEGED	PARAGRAPH IN AMENDED COMPLAINT
First Claim for Relief Hybrid § 301/DFR Claim: Breach of Duty of Fair Representation (¶¶ 155–178)	1. The employer breached the collective bargaining agreement.	¶¶ 2-4, 7, 15, 16, 23, 25, 28, 34-39, 47, 48, 50, 51, 53, 54, 55, 58-60, 68, 80, 88, 89, 90, 91, 92, 93, 95, 96, 120, 121, 131, 133, 134, 160, 164, 166-170, 179-203, 208, 211, 213, 222, 230, 239, 274, 275
	2. The union owed a duty of fair representation in its conduct.	¶¶ 2, 3, 5, 15, 16, 25, 26, 57, 61, 62, 94, 97, 122, 156-159
	3. The union breached its duty of fair representation.	¶¶ 3, 5, 7, 16, 25, 33, 34, 40, 41, 43, 44, 45, 53, 57, 61, 62, 63, 88, 97-102, 104, 107, 109-114, 116, 118-134, 155-177, 226-230, 257-262, 282, 283

(¶¶ 279–285)		170, 179-203, 208, 211, 213, 222, 230, 239, 274, 275
	2. The union breached its duty of fair representation	¶¶ 3, 5, 7, 16, 25, 33, 34, 40, 41, 43, 44, 45, 53, 57, 61, 62, 63, 88, 97-102, 104, 107, 109-114, 116, 118-134, 155-177, 226-230, 257-262, 282, 283
	3. The union’s conduct was motivated by discriminatory animus	¶¶ 5, 31, 32, 33, 34, 38-44, 53, 56, 57, 61, 98-102, 109-114, 116, 120-134, 161-164, 173, 220-231, 251-259, 261-263, 281, 283-284

Dated: July 29, 2025
New York, New York

Respectfully submitted,

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